

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
WESTERN DIVISION

IN RE:

BEVERLY BARNES,

Debtor(s).

§  
§  
§  
§  
§

Bankr. No. 15-70725  
Chapter 13

**OBJECTION TO CLASSIFICATION OF CLAIM**

NOW COMES DEBTOR(S), by and through undersigned counsel, and respectfully object(s) to the classification of claim #9 filed by CAVALRY SPV LLC Assignee of CAPITAL ONE, NA totaling \$3,853.22 and listing as secured the amount of \$3,010.00, for the following reason(s):

1. Debtor proposes to surrender remaining interest in collateral (2006 KAWASAKI 6612) to Creditor per their Chapter 13 Plan dated May 13, 2015.

WHEREFORE, debtor(s) pray(s) this Honorable Court disallow claim #1 filed by SHEFFIELD FINANCIAL as filed, and allow any later deficiency balance claim to be filed as unsecured.

DATED: August 4, 2015

/S/ Kathryn L. Bettis  
K. L. Bettis LLC  
1902 Hackberry Ln., Tuscaloosa, AL 35401  
(205) 614-8540 phone / (205) 383-3210 fax  
[klb@bettisllc.com](mailto:klb@bettisllc.com)

**CERTIFICATE OF SERVICE**

I certify that I served a copy of the foregoing on the Chapter 13 Standing Trustee via ECF and the following persons or parties via U.S. Mail, first-class postage pre-paid, or electronic mail where available, this August 4, 2015.

Cavalry Spv LLC  
c/o Bass & Associates PC  
3936 E. Ft. Lowell Road  
Suite 200  
Tuscan, AZ 85712

/s/ Kathryn L. Bettis